United States Steel Corporation
Law Department
600 Grant Street
Pittsburgh, PA 15219-2800
Tel: 412.433.2919
Fax: 412.433.2964
E-mail: dwhacker@uss.com

David W. Hacker
Attorney

COPY

July 21, 2009

RECEIVED
JUL 23 2009
Air Protection Division (3AP12)

VIA UPS OVERNIGHT DELIVERY

Mr. Christopher B. Pilla, Chief
U. S. Environmental Protection Agency
Region – III Air Enforcement Branch (3AP12)
1650 Arch Street
Philadelphia, PA 19103

RE: July 7, 2009 Clean Air Act §114 Request
Directed to United States Steel Corporation Clairton Works

Dear Mr. Pilla:

On or about July 7, 2009, United States Steel Corporation (U. S. Steel) received a Clean Air Act §114 Request for Information regarding its coke facility in Clairton, Pennsylvania. The Request required U. S. Steel to provide certain information regarding its ammonia still and benzene waste operations within 14 calendar days of receipt of the Request.

In response to the EPA Request, U. S. Steel is providing the information enclosed herein and referenced attachments, as discussed below. While responding to these Requests in good faith, U. S. Steel believes that the Requests are unduly burdensome and overly broad, especially to the time frame to which the Requests pertain. U. S. Steel specifically objects to any definition or Request that can be interpreted to impose on U. S. Steel an obligation to collect information greater than that imposed by §114 of the Clean Air Act. By providing a response, U. S. Steel does not concede to the relevance or materiality of the information sought by any request or subject matter to which they refer, nor does U. S. Steel waive any such objections. Please note that the responses provided herein or attached shall not constitute any admission of liability on the part of U. S. Steel for any alleged violations. Finally, while providing available responsive data regarding the Koppers facility, U. S. Steel maintains that is not responsible for any alleged violations of Koppers.

Per my discussions with Ms. Erin Smith of the Air Protection Division, U. S. Steel is responding with responsive information that was able to be collected within the short-time period demanded by the Request. Because U. S. EPA is requesting information that goes back to 1993, U. S. Steel has indicated that it will continue to search for additional responsive information; and will supplement this response should additional, responsive information be located. In my telephone conversation, Ms. Smith indicated that any supplemental response sent by August 21, 2009 would be acceptable. U. S. Steel appreciates the Agency's understanding of the need for additional time to respond with information that is not otherwise readily available. For ease of review, the inquiries as provided in the request along with U. S. Steel's responses are provided below:

Y-401

1. U. S. EPA REQUEST NO. 1:
Provide process flow diagrams or other facility diagrams of all benzene waste piping, sumps, pumps, and tanks located at Clairton Works.

U. S. STEEL RESPONSE:
Please refer to Tab 1 where U. S. Steel provides available, responsive diagrams and drawings. These diagrams include a general layout of the benzene waste piping and flow at the Clairton plant. U. S. Steel notes that the benzene wastes received from Koppers enters the U. S. Steel ammonia still. The Koppers flow is metered prior to mixing with U. S. Steel's flow into the ammonia still. The available flow values are provided in response to Request No.3, below. U. S. Steel also notes that it maintains detailed diagrams of the benzene flow and treatment through-out the coke-by products plant – beyond what is required for compliance with Benzene NESHAPs Subparts L, V, and FF. U. S. Steel maintains that such diagrams are beyond the scope of the request, but believes it must disclose their existence to U. S. EPA. U. S. Steel continues to search for responsive information and reserves the right to supplement its response.

2. U. S. EPA REQUEST NO. 2:
Provide sample results demonstrating percent benzene in waste conveyed to the ammonia still at the Clairton Works for the time period 1993 - 2009.

U. S. STEEL RESPONSE:
Please refer to Tab 2 where U. S. Steel provides currently available responsive information dating back to January 2005 through the present. U. S. Steel continues to search for responsive information and reserves the right to supplement its response.

3. U. S. EPA REQUEST NO. 3:
Provide flow monitoring data for benzene waste contributions to the ammonia still for the years 1993-2009.

U. S. STEEL RESPONSE:
Please refer to Tab 3 where U. S. Steel provides currently available responsive information. U. S. Steel is currently only able to provide responsive information dating back to 2003 through the present. U. S. Steel continues to search for responsive information prior to 2003 and reserves the right to supplement its response.

4. U. S. EPA REQUEST NO. 4:
Provide any agreement, contract, and/or correspondence, formal or informal, between Koppers, Inc., and USS for the conveyance and treatment of benzene wastes.

U. S. STEEL RESPONSE:
Please refer to Tab 4 where U. S. Steel provides a copy of the Services Agreement between U. S. Steel and Koppers that is currently in effect. Please note that Aristech's rights and obligations under the Agreement have been assigned to Koppers pursuant to provision 14.6 of

the Agreement. U. S. Steel is asserting its claim that the response provided to this Request shall be treated as Confidential Business Information (CBI) pursuant to 40 CFR §2.203(b); *and the attachment is marked accordingly.*

5. U. S. EPA REQUEST NO. 5:
Provide engineering calculations and/or performance tests demonstrating the efficiency of the ammonia the ammonia still and any associated auxiliary equipment for treatment of benzene wastes.

U. S. STEEL RESPONSE:
A recent benzene analysis shows an ammonia still influent concentration of 327.2 mg/L and an effluent concentration of <0.0004 mg/L. This reveals a removal efficiency of greater than 99.99%. In addition, U. S. Steel is providing additional, older analyses as provided behind Tab 5. U. S. Steel continues to search for responsive information and reserves the right to supplement its response.

6. U. S. EPA REQUEST NO. 6:
Explain the operation of the ammonia still and the treatment mechanism(s) utilized to treat benzene waste by the still.

U. S. STEEL RESPONSE:
The primary function of ammonia stills at coke plants is to remove ammonia and acid gases from the waste water using steam to strip those components from the water. It takes a vigorous stripping action to do this. Ammonia and acid gas reduction must be very good to make the water acceptable for feed to biological treatment systems to reduce toxicity and protect the biological organisms. This process also removes volatile organic compounds that have a boiling point below water such as benzene which has a normal boiling point of about 80 degrees centigrade. Thus, it is readily removed by the ammonia still. Benzene is also toxic to the biological organisms. The benzene is removed from the wastewater in the two stage ammonia still and sent to the By-Products.

7. U. S. EPA REQUEST NO. 7:
Provide documentation and discussions of how Koppers , Inc. and USS handled the separate NESHAP reporting and record-keeping requirement, as requested by EPA in its March 5, 1993 Subpart FF Applicability Determination requested by Koppers.

U. S. STEEL RESPONSE:
U. S. Steel first notes that until I requested a copy from Ms. Erin Smith on July 14, 2009, it has never received a copy of the referenced March 5, 1993 correspondence. Nonetheless, U. S. Steel maintains that since the units at U. S. Steel up to the ammonia still are controlled and the ammonia still is a closed system that is vented back to the coke oven gas, U. S. Steel's reporting procedures are compliant with Subpart FF. This is because U. S. Steel counts and includes contributions of benzene from the Koppers-generated benzene wastes that are directed to the ammonia still in the U. S. Steel TAB reports. U. S. Steel's reporting procedure is consistent and compliant with the TAB reporting rule (Subpart FF) since the point of generation for a wastestream regulated by Subpart L is considered the outlet or effluent from the regulated

unit. U. S. Steel further notes that it is not responsible for any failure to report or maintain records by Koppers.

8. U. S. EPA REQUEST NO. 8:
Explain what portion, if any, of the "Ammonia Still Effluent," value reported in USS's annual TAB reports consists of wastes generated by Koppers, Inc., and how this value is calculated each year for the years 1993-2009.

U. S. STEEL RESPONSE:
The mass reported in the TAB attributable from Koppers is determined by taking the ammonia still benzene effluent concentration multiplied by the Koppers' proportion of flow into the still on an annual basis. This is acceptable since the point of generation is the effluent from the still and under normal conditions the influent concentration of benzene does not normally affect the effluent concentrations. Please refer to the documents provided behind Tab 6 for more detailed responsive information. U. S. Steel is currently only able to provide responsive information dating back to 2003 through the present. U. S. Steel continues to search for responsive information prior to 2003 and reserves the right to supplement its response.

9. U. S. EPA REQUEST NO. 9:
Describe how USS manages its own and Koppers, Inc benzene waste in the event of a shutdown or malfunction of the ammonia still.

U. S. STEEL RESPONSE:
At Clairton, U.S. Steel operates two ammonia stills that run in series. A spare still that can be used for either stage is also maintained. U.S. Steel also maintains storage space (e.g., tanks) for wastewater if needed for example during ammonia still maintenance. U. S. Steel adds that the ammonia stills are very reliable; and malfunctions and shutdowns are very rare. However, when such incidents have occurred in the past, U. S. Steel maintains that its procedures, as outlined herein, have proven appropriate and effective.

10. U. S. EPA REQUEST NO. 10:
Demonstrate how USS measures the effluent flow from the ammonia still and how it differentiates between USS and Koppers, Inc. flows.

U. S. STEEL RESPONSE
U. S. Steel separately meters the flow from Koppers that is directed to the U. S. Steel ammonia still. These values are provided in the attached spreadsheet behind Tab 3. U. S. Steel also meters the total flow to the still. These values are also provided behind Tab 3. Therefore, the difference from the metered total flow and the Koppers metered flow is used to determine U. S. Steel's flow to the ammonia still. U. S. Steel then measures the flow from the still to the aeration basins which is the same value as the still effluent. There are two aeration basins in parallel, each equipped with a flow meter. U. S. Steel differentiates the effluent flow from the still between U. S. Steel and Koppers based upon the measurement of influent from these sources. U. S. Steel is currently only able to provide responsive information dating back to 2003 through the present.

A certification statement regarding this correspondence and all attachments is provided on the following page. Should you have any questions regarding this response or the attachments, please contact me.

Very truly yours,

David W. Hacker

DWH

cc: E. Smith (USEPA) – cover letter only by e-mail
L. Roudabush (USS)
M. Hohman (USS)
C. Davis (USS)
D. Smiga (USS)
T. Woodwell (USS)
M. Jeffrey (USS)